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TESLA, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

TESLA, INC., a Texas Corporation,,

Plaintiff,

v.

PROCEPTION, INC., a Delaware Corporation,  
and ZHONGJIE “JAY” LI, an individual,

Defendants.

CASE NO. 5:25-cv-04963-SVK

**[PROPOSED] ORDER SEALING  
DEFENDANTS’ OBJECTION  
TO NEW EVIDENCE AND  
PROPOSED SUR-REPLY**

The Court, having considered Plaintiff Tesla, Inc.'s statement regarding the sealing of Defendants' Objection to New Evidence and Exhibit A to Defendants' Administrative Motion for Leave to File Sur Reply In Support Of Opposition to Plaintiff's Motion for Preliminary Injunction, finds that good cause exists to seal the material and hereby **ORDERS THE MATERIAL SEALED** as follows:

Document	Portions to be Filed Under Seal	Designating Party	Basis for Sealing
<b>Dkt. 91-3, Exhibit A to Defendants' Administrative Motion for Leave to File Sur Reply ISO Opposition to Plaintiff's Motion for Preliminary Injunction</b>	i:5 (name of Tesla employee) 1:8 (name of Tesla employee) 1:9 (sensitive Tesla vendor information) 1:21 (Tesla employee name) 1:23 (sensitive Tesla vendor information) 1:24 (Tesla employee name) 1:25 (Tesla employee name) 1:26 (Tesla employee name) 1:28 (Tesla employee name) 1:28 (sensitive Tesla vendor information) 2:1 (Tesla employee name) 2:1 (sensitive Tesla vendor information) 2:2 (sensitive Tesla vendor information) 2:3-4 (sensitive Tesla vendor information) 2:8 (Tesla employee name) 2:9 (sensitive Tesla vendor information) 2:22-23 (title of sensitive document related to Optimus) 2:25 (Tesla employee name) 2 n.1 (sensitive Tesla vendor information) 3:1-2 (title of sensitive document related to Optimus) 3:3 (Tesla employee name)	Tesla	These portions disclose personally identifiable information of non-party Tesla employees or interns that encroach upon their privacy interests. Additionally, these portions contain descriptive file names and vendor details related to trade secrets and/or the design and development of Tesla's Optimus technology, and could cause security vulnerabilities, endanger trade secrets, and inflict competitive harm on Tesla. <i>See</i> Ahearn Sealing Decl ¶¶ 3–5.
<b>Dkt. 91-2, Defendants Objection to New Evidence and Argument in Plaintiff's Reply ISO Motion for Preliminary Injunction</b>	3:23 (sensitive Tesla vendor information)	Tesla	These portions disclose sensitive Tesla vendor details that could cause security vulnerabilities, endanger trade secrets, and inflict competitive harm on Tesla. <i>See</i> Ahearn Sealing Decl ¶¶ 3–5.

1  
2 **IT IS SO ORDERED.**

3  
4 DATED: \_\_\_\_\_

By: \_\_\_\_\_  
The Honorable Susan van Keulen  
United States Magistrate Judge